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June 4, 2021

*Via ECF and Email*

*Via ECF*

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Hon. Kenneth M. Karas, USDJ  
300 Quarropas St., Chambers 533  
White Plains, NY 10601-4150

Re: *The ProImmune Co., LLC v. Holista Colltech Ltd., et al.* [7:20-cv-1247 (KMK)] – ProImmune’s request to extend summary judgment filing deadlines re letter motion to file portions under seal

Your Honor:

Plaintiff/Counterclaim Defendant The ProImmune Company, LLC (“ProImmune”) requests the Court extend the current motion for summary judgment briefing schedule, to permit the parties to exchange evidence in advance of their filings, to mark any sensitive business information that will be subject to ProImmune’s forthcoming letter motion to file each parties’ respective motion for summary judgment and related papers under seal. ProImmune intends on filing that letter motion early next week.

The dispute involves four distribution agreements entered into between the parties, certain aspects of which would diminish or injure ProImmune’s competitive standing if specific terms of the parties’ agreements were disclosed to the public. ProImmune will seek to permit a redacted version of both parties’ motions for summary judgment be filed publicly, and to have a fully unredacted version filed under seal.

Since ProImmune is unaware of the evidence Holista will submit in support of its motion, the parties propose exchanging evidence, whereby ProImmune would mark information to be

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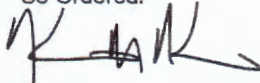
redacted. After the exchange and marking of evidence is complete, the parties will file their motions. The exchange would occur this Monday, June 7. With proposed redactions sent to Holista on June 9. The parties would file their motions Monday June 14.

In order to complete this process, ProImmune requests the Court extend the current summary judgment briefing schedule out one (1) week. The proposed revised schedule would have the opening papers due June 14, opposing papers due July 15, and reply papers due August 6.<sup>1</sup>

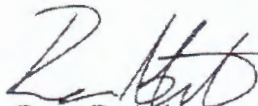
Holista does not oppose Plaintiff's request.

Granted.

So Ordered.

  
6/4/21

Sincerely,

  
Ryan B. Abbott

of BROWN, NERI, SMITH & KHAN LLP

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<sup>1</sup> The original extension requested by Holista set a due date for Saturday July 31, 2021. ProImmune proposes the prior business day.